

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

LANDMARK LEGAL FOUNDATION  
19415 Deerfield Ave, Ste. 312  
Leesburg, VA 20176

Plaintiff,

vs.

ENVIRONMENTAL PROTECTION AGENCY  
1301 Constitution Ave, NW  
Washington, DC 20004

Defendant.

Case No. 1:12-cv-01726 (RCL)

**PLAINTIFF'S REPLY IN SUPPORT OF ITS  
MOTION TO SET PRODUCTION AND BRIEFING SCHEDULE**

In reply to Defendant's Response to Plaintiff's Motion to Set Production and Briefing Schedule, Landmark Legal Foundation respectfully states as follows:

1. Plaintiff is satisfied with Defendant Environmental Protection Agency's assurance that it will search all email accounts, including all public and secondary email accounts for senior officials in EPA headquarters. This is the assurance that Landmark sought, but was unable to secure from EPA, thus requiring Plaintiff to file the instant motion.

2. Landmark accepts the schedule set forth in Defendant's response.

Respectfully submitted,

Landmark Legal Foundation

DATED: February 7, 2013

s/ Richard P. Hutchison

Richard P. Hutchison (MO Bar # 34865)  
(Admitted Pro Hac Vice)

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**CERTIFICATE OF SERVICE**

Undersigned counsel hereby certifies that a true and accurate copy of the foregoing Reply in Support of its Motion to Set Production and Briefing Schedule was filed electronically with the Court by using the CM/ECF system on this 7th day of February, 2013. Parties that are registered CM/ECF users will be served by the District Court's CM/ECF system.

/s/ Richard P. Hutchison  
Richard P. Hutchison  
Attorney for Plaintiff